

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

Related Docket Nos. 69, 783, 893, &
1419

**FOURTH SUPPLEMENTAL DECLARATION OF
JANE VANLARE IN SUPPORT OF APPLICATION
FOR ENTRY OF AN ORDER AUTHORIZING EMPLOYMENT AND
RETENTION OF CLEARY GOTTlieb STEEN & HAMILTON LLP
AS COUNSEL FOR THE DEBTORS AND DEBTORS-IN-POSSESSION**

I, Jane VanLare, do hereby declare as follows:

1. I am a member of the firm of Cleary Gottlieb Steen & Hamilton LLP (“Cleary Gottlieb” or the “Firm”),² which maintains an office for the practice of law at, among other places, One Liberty Plaza, New York, New York 10006.

2. I am an attorney at law admitted to practice before the courts of the State of New York and the United States District Courts for the Southern and Eastern Districts of New York.

3. I submit this declaration (the “Fourth Supplemental Declaration”) in connection with (i) the *Debtors’ Application for an Order Authorizing Employment and Retention of Cleary Gottlieb Steen & Hamilton LLP as Counsel for the Debtors and Debtors-in-*

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (or equivalent identifier), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

² Capitalized terms not defined herein shall have the meaning ascribed to the them in the Initial Debtors’ Application.

Possession Nunc Pro Tunc to the Petition Date (the “Debtors’ Application”) (ECF No. 69) and (ii) the *Declaration of Sean A. O’Neal in Support of the Debtors’ Application for an Order Authorizing Employment and Retention of Cleary Gottlieb Steen & Hamilton LLP as Counsel for the Debtors and Debtors-in-Possession Nunc Pro Tunc to the Petition Date* attached as Exhibit A to the Debtors’ Application (the “Initial Declaration”).³ This Court approved the Debtors’ Application on February 24, 2023. ECF No. 103. Unless otherwise stated in this Supplemental Declaration, I have personal knowledge of the facts set forth herein.

4. In the Initial Declaration, Cleary Gottlieb represented that it would file supplemental disclosures with this Court as it became aware of any new material relationship with any potential parties-in-interest. Initial Declaration ¶ 3. Through the course of the Chapter 11 Cases, Cleary Gottlieb has identified certain potential parties-in-interest not previously reflected in Exhibit 1 to the Initial Declaration (collectively, the “Additional Parties”). A further list of Additional Parties is attached hereto as Exhibit A (the “Additional Parties List”).⁴

5. The Additional Parties List includes a creditor who is a Former Client of Cleary Gottlieb that Cleary Gottlieb represented in matters entirely unrelated to the Debtors or the Chapter 11 Cases. The Additional Parties List also includes a Current Client, Norton Rose

³ On October 6, 2023, Cleary Gottlieb filed the *Supplemental Declaration of Jane VanLare in Support of Applications for Entry of Orders Authorizing Employment and Retention of Cleary Gottlieb Steen & Hamilton LLP as Counsel for the Debtors and Debtors-in-Possession* (the “First Supplemental Declaration”) (ECF No. 783). On November 6, 2023, Cleary Gottlieb filed the *Second Supplemental Declaration of Jane VanLare in Support of Applications for Entry of Orders Authorizing Employment and Retention of Cleary Gottlieb Steen & Hamilton LLP as Counsel for the Debtors and Debtors-in-Possession* (the “Second Supplemental Declaration”) (ECF No. 893). On March 3, 2024, Cleary Gottlieb filed the *Third Supplemental Declaration of Jane VanLare in Support of Applications for Entry of Orders Authorizing Employment and Retention of Cleary Gottlieb Steen & Hamilton LLP as Counsel for the Debtors and Debtors-in-Possession* (the “Third Supplemental Declaration”) (ECF No. 1419). This Fourth Supplemental Declaration further supplements the information disclosed in the foregoing.

⁴ Pursuant to the *Order Granting the Debtors’ and the Official Committee of Unsecured Creditors’ Motions for Entry of an Order Requiring the Redaction of Certain Personally Identifiable Information* (the “Sealing Order”) (ECF No. 694), Cleary Gottlieb has redacted Exhibit A from the public version of the Fourth Supplemental Declaration and will provide unredacted copies pursuant to paragraph 5 of the Sealing Order.

Fulbright US LLP (“Norton Rose”), which represents a member of the Committee. Cleary Gottlieb currently represents Norton Rose in another Chapter 11 case that is wholly unrelated to these Chapter 11 Cases. Further, Cleary Gottlieb is choosing to disclose, out of an abundance of caution, that an individual scheduled to begin employment at Cleary Gottlieb in Summer 2024 as a paralegal is the daughter of an attorney engaged as counsel for the Committee.

* * *

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on April 12, 2024
New York, New York

/s/ Jane VanLare
Jane VanLare

Exhibit A¹

Additional Parties

¹ Certain names listed in this Exhibit A are redacted pursuant to the Court's *Order Granting the Debtors' and the Official Committee of Unsecured Creditors' Motions for Entry of an Order Requiring the Redaction of Certain Personally Identifiable Information*, ECF No. 694.

Additional Parties in Interest

Former Clients

[REDACTED]

Current Clients

Norton Rose Fulbright US LLP